

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

RBS FINANCIAL PRODUCTS INC. (F/K/A
GREENWICH CAPITAL FINANCIAL PRODUCTS,
INC.); RBS ACCEPTANCE INC. (F/K/A GREENWICH
CAPITAL ACCEPTANCE, INC.); FINANCIAL ASSET
SECURITIES CORP.; RBS SECURITIES INC. (F/K/A
GREENWICH CAPITAL MARKETS, INC.); JOSEPH
N. WALSH III; ROBERT J. MCGINNIS; CAROL P.
MATHIS; JOHN C. ANDERSON; and JAMES M.
ESPOSITO,

Defendants.

Civil Action No. 3:11-30044-MAP

MOTION FOR STATUS CONFERENCE

Now comes plaintiff Massachusetts Mutual Life Insurance Company (“MassMutual”) in the above-captioned matter and asks the Court to schedule a status conference on July 27, 2011 with respect to the schedule both for argument on the defendants’ motions to dismiss and for discovery. As grounds for this motion, MassMutual submits that it would be productive at this point for the Court and the parties to establish a schedule for both items, given the legal and factual matters at issue.

MassMutual asks that the Court conduct a combined, concurrent conference on the following cases: Civil Action No. 3:11-30035; Civil Action No. 3:11-30039; Civil Action No. 3:11-30044; Civil Action No. 3:11-30047; and Civil Action No. 3:11-30048. MassMutual is the plaintiff in all of these cases, and the cases share a common briefing schedule on all defendants’

motions to dismiss, as ordered by this Court. For the convenience of the Court and the parties, MassMutual asks that the Court establish a combined discovery schedule as well.

Alternatively, if the Court's calendar cannot accommodate the proposed conference on July 27, 1011, MassMutual requests a conference with the Magistrate Judge for the same purpose.

LOCAL RULE 7.1 CERTIFICATION

I, Stephen E. Spelman, certify that counsel for the plaintiff has conferred in good faith with counsel for the defendants in an attempt to resolve this issue.

Respectfully submitted,
Massachusetts Mutual Insurance Company

/s/ Stephen E. Spelman

Edward J. McDonough Jr., Esq. – BBO#331590
Stephen E. Spelman, Esq. – BBO#632089
Egan, Flanagan and Cohen, P.C.
67 Market Street – P. O. Box 9035
Springfield, MA 01102-9035
ejm@efclaw.com; ses@efclaw.com

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 19th day of July 2011.

/s/ Stephen E. Spelman

Stephen E. Spelman, Esq.